

1 Babak Semnar, Esq. (#224890)
2 Semnar Law Firm, Inc.
3 41707 Winchester Road, Suite 201
4 Temecula, CA 92081
5 Telephone: (951) 293-4187; Fax: (888) 819-8230

6 Jared M. Hartman, Esq. (#254860)
7 Hartman Law Office, Inc.
8 41707 Winchester Road, Suite 201
9 Temecula, CA 92081
10 Telephone: (951) 234-0881; Fax: (888) 819-8230

11 Attorneys for Plaintiffs

12 **U.S. DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 NICOLE CLAVESILLA, an individual,
15 & ART VILLASENOR, an individual

16 MDL Case No.:
17 3:11-MD-02286-MMA-MDD

18 Plaintiffs,

19 v.
20 **DECLARATION OF COUNSEL**
21 **FOR PLAINTIFF NICOLE**
22 **CLAVESILLA AND PLAINTIFF**
23 **ART VILLASENOR IN RESPONSE**
24 **TO ORDER TO SHOW CAUSE**

25 MIDLAND CREDIT
26 MANAGEMENT, an incorporation,

27 Defendant.

28 TO THE CLERK OF THE COURT, ALL PARTIES, COUNSEL OF RECORD, AND
29 THE HONORABLE U.S. DISTRICT COURT JUDGE:

30 PLEASE TAKE NOTICE that counsel for PLAINTIFFS NICOLE
31 CLAVESILLA and ART VILLASENOR submit the following Declaration of Counsel
32 in response to Motion for Order to Show Cause.

33 **DECLARATION OF JARED M. HARTMAN, ESQ.**

34 I, Jared M. Hartman, Esq., declare:

35 1. I am an attorney in good standing within the State of California, and am a

member in good standing of this Court.

2. I am counsel of record in this matter for Plaintiffs.

3. The following declaration is of my own personal knowledge, unless otherwise stated, and if called to testify as to its contents I could and would do so competently.

4. On November 16, 2018, the Court issued an Order for Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR to file a Response by November 30, 2018 to Defendant's Motion for Order to Show Cause. *See*, Dckt. ##615, 615-2, 616, 616-2, 617.

5. On November 27, 2018, Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR filed a Joint Notice of Settlement as to all claims by them against Defendant in this matter. *See*, Dckt. #622.

6. Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR and Defendant are currently working together to finalize a written settlement agreement and to execute the same.

7. After the settlement agreement and terms are executed, Plaintiffs' case will be dismissed, with prejudice, with each party to bear its own costs and fees.

8. As such, Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR request that they be relieved from any further Order to Show Cause and any further discovery issues, and further request that any and all pending dates/deadlines/hearings be vacated as to their case, as any such matters are moot in light of the settlement and eventual dismissal of Plaintiffs' claims.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct according to the best of my knowledge, and that this declaration was executed on November 30, 2018.

Jared M. Hartman